

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Lynchburg Division**

In re:

**SERVICE DOGS BY WARREN
RETRIEVERS, INC.,**

Debtor.

**Case No. 20-60860-RBC
Chapter 7**

**TRUSTEE'S OMNIBUS REPLY TO OBJECTIONS
TO GLOBAL RESOLUTION MOTIONS**

W. Stephen Scott, the Chapter 7 Trustee (the “**Trustee**”) for the bankruptcy estate (the “**Estate**”) of Service Dogs by Warren Retrievers, Inc. (the “**Debtor**”), by counsel, files this Omnibus Reply to Objections to Global Resolution Motions and, in support thereof, respectfully states as follows:

Preliminary Statement

The Trustee submits, in the exercise of his sound business judgment, that the settlement and resolution of claims set forth in the Global Resolution Motions (as defined below) is the only clear path to a guaranteed recovery of assets for the benefit of creditors. While the Trustee is not unsympathetic to the many families who paid the Debtor for a service dog and never received one or received one with inadequate training, the Trustee has determined that litigating the claims set forth in his Complaint filed against Charles D. Warren, Jr. (“**Warren**”), Bordeaux Farms, LLC (“**BF**”), and Charitable Occasion, LLC (“**CO**”), in Adversary Proceeding No. 20-06045-RBC (the “**Adversary Proceeding**”) involves substantial risk. To prevail in that litigation, the Trustee will have to prove numerous elements and hope that the Court’s judgment on each element falls in his favor in order to achieve the same end result that the Global Resolution Motions accomplish. If

the Trustee fails to prove any one element, the litigation will most surely fail, and creditors will be left empty-handed. Even if the Trustee succeeds in proving all the required elements to prevail in the litigation, there is no guaranty that the Trustee will be able to find a ready, willing, and qualified purchaser for the BF Property¹ at fair market value at the conclusion of the litigation. It may take the Trustee months to locate a new purchaser for the BF Property, and the purchase price may be substantially lower. When the Trustee finally identifies a new purchaser, he will still have to address the two liens of record asserted by Marianne Warren against the BF Property. For these reasons, as well as the additional reasons set forth herein and in the Global Resolution Motions, the Trustee submits that the relief requested in the Global Resolution Motions is an exercise of the Trustee's sound business judgment, satisfies the fair and equitable test, and should be granted.

Background Information

1. On May 13, 2021, the Trustee filed with this Court three separate but related motions: *Motion for Authority to Accept a Settlement Pursuant to Federal Rule of Bankruptcy Procedure 9019(A) and for Related Relief* [Docket No. 102] (the “**Warren Parties Settlement Motion**”); *Chapter 7 Trustee’s Motion for (I) Authority to Sell Property of the Estate at Private Sale Free and Clear of All Liens, Claims, Rights, and Interests; (II) Authority Related to Closing and Distribution of Sale Proceeds; and (III) Related Relief* [Docket No. 103] (the “**Sale Motion**”); and *Motion for (I) Authority to Accept a Settlement Pursuant to Federal Rule of Bankruptcy Procedure 9019(A); (II) Final Allowance and Authorization of Payment of Compensation to Trustee’s Special Counsel; and (III) Related Relief* [Docket No. 106] (the “**Marianne Settlement Motion**”).

¹ Capitalized terms used but not defined herein shall have the same meaning ascribed to such term in the Global Resolution Motions.

2. The Warren Parties Settlement Motion, the Sale Motion, and the Marianne Settlement Motion are part of a global resolution (the “**Global Resolution**”) of claims and causes of action between the Trustee, on the one hand, and Warren, BF, CO, and Jacob M. Dudek-Warren (collectively, the “**Warren Parties**”), and Marianne Warren (“**Marianne**”), on the other hand. The Warren Parties Settlement Motion, the Sale Motion, and the Marianne Settlement Motion are hereinafter referred to as the “**Global Resolution Motions**.”

3. Each of the Global Resolution Motions is more particularly described in the Omnibus Notice of Hearing on and Opportunity to Object to Global Resolution Motions [Docket No. 107] (the “**Omnibus Notice**”). The essence of the settlement is: (a) BF will transfer ownership of the BF Property to the Debtor, (b) the Debtor will sell the BF Property to the existing contract purchasers for \$1.225 million, (c) the net proceeds of sale will be divided between the Estate and Marianne Warren, with the Estate retaining 62% of the net sale proceeds and Marianne receiving 38% of the net sale proceeds, and (d) the parties will give each other mutual releases.

4. Although the Global Resolution has been structured as three separate but related motions, the Global Resolution is an all-or-nothing proposition. If, for example, the Marianne Settlement Motion is denied, the Warren Parties Settlement Motion and the Sale Motion shall be deemed null and void. The Global Resolution cannot be achieved unless all three Global Resolution Motions are approved by the Court.

5. Prior to agreeing the Global Resolution, the Trustee and his counsel engaged in extensive investigation and due diligence. Trustee’s counsel reviewed and analyzed over 15,000 pages of documents produced by third parties in response to subpoenas issued by the Trustee pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure. These documents included bank statements for the Debtor, Warren, BF, CO, and Marianne. Trustee’s counsel spent hours

interviewing former employees, board members, and customers of the Debtor. The Trustee, his counsel, and a real estate advisor visited the BF Property and spent several hours on-site examining the condition of the house, barns, guest cottage, various outbuildings, fencing and fixtures. The Trustee's investigation was thorough and comprehensive.

6. A total of twenty-three objections or responses to the Global Resolution Motions were filed as of the date hereof. Of these objections, twenty-one (the "**Customer Objections**") appear to have been filed by customers of the Debtor who paid money to the Debtor but never received a service dog or received a dog with inadequate training or an unsuitable temperament. One objection (the "**Litigant Objection**") was filed by the plaintiffs in a lawsuit filed against the Warren Parties and Marianne in the United States District Court for the Eastern District of Virginia. The final response was a print-out from an online petition against the Global Resolution signed by multiple parties—some of whom have filed Customer Objections and some of whom do not appear to be creditors or parties in interest² (the "**Online Petition**" and, together with the Customer Objections and the Litigant Objection, the "**Objections**"). Notably, the two creditors with the potentially largest stake in the Global Resolution – the IRS and the Commonwealth of Virginia – did not file a response to the Global Resolution Motions.

7. The Objections share common themes – notably, a misunderstanding of why the Global Resolution was structured as it was and why Marianne is receiving any share of the net sale proceeds. The Trustee responds to these objections below.

² The Trustee submits that some of the people who joined in the Online Petition may not have standing to object to the Global Resolution Motions.

Trustee's Reply to Objections

A. The Trustee Has No Evidence that Marianne Was Involved in the Debtor's Fraudulent Scheme.

8. The Objections state that Marianne should not receive any of the sale proceeds from the sale of the BF Property because she was either an active participant in, a facilitator of, or at the very least complicit in the fraudulent scheme perpetuated by the Debtor.

9. As noted above, the Trustee's investigation and due diligence in this case has been extensive. Trustee's counsel has spent hundreds of hours investigating possible claims and causes of action, reviewing and analyzing financial and other documents, and interviewing third parties with first-hand knowledge of the Debtor's business operations. Notwithstanding the thorough investigation, the Trustee has thus far found no evidence of Marianne's involvement on any level in the Debtor's scheme.

10. Through his investigation, the Trustee confirmed that Marianne provided certain financial support to the Debtor, as follows: (a) Marianne and her late husband, Charles Warren, Sr., executed a note and deed of trust in favor of Essex Bank in the maximum principal amount of \$669,040.64 in 2011, when the BF Property was purchased; (b) Marianne paid the balance of the Essex Bank loan in full in November 2016 in the approximate amount of \$400,000, and Essex Bank released its Deed of Trust by filing a Certificate of Satisfaction with the Circuit Court for Madison County on December 19, 2016; (c) Marianne paid the initial \$100,000 settlement payment due to Spotts Fain in December 2019 pursuant to the confirmed Chapter 11 Plan of Reorganization of Bordeaux Farms (the "**BF Plan**") (and, upon information and belief, since the Petition Date, Marianne continues to make the monthly payments due to Spotts Fain under the BF Plan); and (d) Marianne made certain periodic payments to the Debtor in the amount of \$25,000

each during 2019 for the purported purpose of helping the Debtor make its payroll payments and pay expenses critical to the Debtor's continued operation.

11. The Trustee has also confirmed that Marianne received payments from the Debtor in the aggregate amount of \$119,000 during the one-year preference period prior to the Petition Date. The Trustee believes that Marianne may have a new value defense that greatly reduces her preference exposure.

12. Other than the above financial transactions, the Trustee has found no evidence that Marianne had any involvement with the Debtor and its business operations. Upon information and belief, she was not on the Board of Directors and did not serve in any official capacity with the Debtor. There are no references that the Trustee has found on social media, in the Debtor's marketing materials, or otherwise, connecting Marianne to the Debtor in any capacity. For these reasons, the Trustee does not believe that the Estate has any viable claims against Marianne, other than a potential preference action, which has minimal value in comparison to the proposed Global Resolution.

B. Marianne Has, at Minimum, an Equitable Lien against the BF Property.

13. The Objections also point to the dubious validity of the liens asserted by Marianne against the BF Property. The Litigant Objection, in particular, objects to Marianne's purported liens because Marianne has provided conflicting amounts to different parties.

14. As stated in the Marianne Settlement Motion, Marianne has two recorded Deeds of Trust against the BF Property: (a) that certain Deed of Trust dated January 11, 2017, made by Warren as Grantor for the benefit of Marianne and her late husband, Charles D. Warren, Sr., and securing a Deed of Trust Note, also dated January 11, 2017, made by Warren for the benefit of Marianne and her late husband, Charles D. Warren, Sr., in the original principal amount of

\$400,000.00 (the “**2017 Deed of Trust**”) and (b) that certain Credit Line Deed of Trust dated February 4, 2021, made by Warren, BF, and CO as Grantor for the benefit of Marianne and securing a Credit Line Deed of Trust Note made by Warren, BF, and CO for the benefit of Marianne in the original principal amount \$600,000.00 (the “**2021 Deed of Trust**”).

15. The 2017 Deed of Trust was not properly filed. The legal description to the BF Property is attached to the 2017 Deed of Trust, but BF, the legal owner of the BF Property, is not a grantor under the Deed of Trust. On January 13, 2021, Warren filed a Corrected Deed of Trust in the Recording Office, adding BF as a Grantor. The Corrected Deed of Trust purports to relate back to the January 11, 2017, Deed of Trust.

16. Based upon the Trustee’s investigation and analysis, the 2017 Deed of Trust represents amounts advanced by Marianne to pay the balance of the Essex Bank loan in November 2016. After the Essex Bank Deed of Trust was released of record in mid-December 2016, Marianne recorded her 2017 Deed of Trust. Notwithstanding that the 2017 Deed of Trust was not properly recorded until the Corrected Deed of Trust was filed, the Trustee believes that Marianne has, at the very least, a colorable argument for an equitable lien against the BF Property in the approximate amount of \$400,000. If, instead of having Marianne pay the balance of the Essex Bank loan, BF had sought to refinance the Essex Bank loan through a bank or other financial institution, the Trustee would most certainly have had to pay the secured lien of that bank from the proceeds of sale.

17. The Trustee acknowledges that the 2017 Deed of Trust was not listed on the schedules filed by BF in its chapter 11 bankruptcy, nor did the BF Plan provide for payments to Marianne pursuant to the 2017 Deed of Trust. BF’s failure to schedule and provide for the 2017

Deed of Trust does not, however, affect any secured interest Marianne may have in the BF Property.

18. The Trustee recognizes that the 2021 Deed of Trust has several significant issues that affect its validity and priority. For that reason, the Trustee heavily discounted the 2021 Deed of Trust in his analysis. The projected recovery to Marianne in the Global Resolution is approximately \$380,000, which is less than the value of her potential equitable lien against the BF Property.

C. Warren Is Subject to an IRS Lien.

19. On October 5, 2020, the Internal Revenue Service filed a Notice of Federal Tax Lien (the “**IRS Lien**”) against Warren individually in the Circuit Court for Madison County, Virginia. The amount of the IRS Lien is approximately \$750,000 and covers the tax years 2012 through 2017. The IRS Lien was properly recorded and indexed. Since the filing of the IRS Lien, additional penalties and interest have continued to accrue.

20. The IRS Lien attaches to all property that Warren owns individually. With respect to single-member limited liability companies owned by Warren, such as BF and CO, the IRS Lien does not attach to the property of the LLC. Instead, the IRS Lien only attaches once the LLC has distributed property to Warren.

21. For that reason, it was important to the Trustee that the sale of the BF Property not occur at the LLC level. The Trustee was rightfully concerned that if BF sold the BF Property to the Purchasers, the net proceeds of sale would become Warren’s personal property and thus be subject to the IRS Lien. Depending on the amount of accrued interest and penalties, the IRS Lien would have absorbed most if not all of the proceeds of sale from the BF Property, leaving nothing for creditors.

22. The BF Property is the only asset of significant value owned by Warren. The Trustee, by counsel, carefully negotiated and structured the Global Resolution to protect and preserve this asset for the benefit of the Estate and the unsecured creditors, which was no small task. Because of the IRS Lien, the Trustee submits that overall structure of the Global Resolution provides the only clear path to the recovery of assets for the Estate.

Fair and Equitable Test

23. The Trustee submits that the relief requested in the Global Resolution Motions is an exercise of the Trustee's sound business judgment and satisfies the fair and equitable test. As discussed in the Warren Parties Settlement Motion and the Marianne Settlement Motion, a compromise and settlement must satisfy the "fair and equitable" test. *Protective Comm. for Indep. Stockholders of TMT Trailer Ferry, Inc. v. Anderson*, 390 U.S. 414, 424 (1968). The factors considered by the Courts in determining whether a settlement is fair and equitable include the probability of success in litigation, potential difficulties in collection, the complexity, delay and expense of litigation, and the interests of creditors. *See In re Frye*, 216 B.R. 166, 174 (Bankr. E.D.Va. 1977).

24. The Trustee submits that the proposed Global Resolution satisfies the fair and equitable test. Because of the nature of the Trustee's claims against Warren, BF, and CO (*i.e.*, substantive consolidation and alter ego theories), the litigation involves substantial risks and uncertainties. It is complicated, fact-intensive, and lengthy. To succeed on the merits, the Trustee will have to prove several elements, and the Court must rule in the Trustee's favor on each of these elements. Moreover, even if the Trustee prevailed in the Adversary Proceeding, the delay created by litigation would likely cause the current contract purchasers for the BF Property to terminate their contract. The Trustee would then have the burden of maintaining the BF Property until it

could be marketed and sold to another purchaser or – because the Estate currently has no assets from which to pay maintenance costs – the Trustee would be forced to sell the BF Property quickly, and potentially at a steep discount. Finally, the Trustee would still have to address Marianne's liens at some point in order to sell the BF Property free and clear to a third party purchaser.

25. The interests of creditors are also best served by the Global Resolution. The Global Resolution is the only clear path to the recovery of the BF Property, which is by far the most valuable asset still owned or controlled by Warren. The transfer of the BF Property to the Estate and the subsequent sale thereof to the contract purchasers will allow the Trustee to make a meaningful distribution to creditors, the vast majority of whom are individuals and families with relatively small claims. If the Global Resolution Motions are not approved, there is a possibility that the Trustee will not recover any assets for the benefit of the Estate, and creditors will be left empty-handed.

WHEREFORE, for all the foregoing reasons, the Trustee respectfully requests that the Court overrule the objections and grant the Global Resolution Motions.

Dated: June 1, 2021

/s/Robert S. Westermann

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of June, 2021, the foregoing Trustee's Omnibus Reply to Objections to Global Resolution Motions was served (i) by operation of the Court's CM/ECF electronic case filing system on all parties entitled to receive notice thereby and (ii) by electronic or first-class U.S. mail, as applicable, on the U.S. Trustee and all parties filing Objections, as identified on the attached service list.

/s/Robert S. Westermann

Robert S. Westermann

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